

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO: <i>Roberts v. Zhejiang Huahai Pharmaceutical Co. Ltd.,</i> Case No. 1:20-cv-00946-RMB-SAK	HON. RENÉE MARIE BUMB

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF
PLAINTIFFS' MOTION TO EXCLUDE DEFENSE EXPERT
DR. GREGORY DIETTE DUE TO UNTIMELY DISCLOSURE OF
GENERAL CAUSATION OPINION**

DANIEL A. NIGH, hereby certifies as follows:

1. I am an attorney at law within the State of Florida with Nigh Goldenberg Raso & Vaughn, PLLC, and serve as Co-Lead Counsel of the Valsartan Litigation. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the report and testimony of Gregory Diette, MD, MHS. Highlights have been added to the following exhibits to correspond to citations in the motion to exclude.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the Expert Report of Gregory Diette, MD, MHS.

3. Attached hereto as **Exhibit B** is a true and accurate copy the May 8,
2025 Deposition Transcript of Gregory Diette, MD, MHS.

**NIGH GOLDENBERG RASO
VAUGHN, PLLC**
Attorneys for Plaintiffs

Dated: May 22, 2025

By: /s/ Daniel A. Nigh
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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Daniel A. Nigh

Daniel A. Nigh, Esq.